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MEMO ENDORSED

March 3, 2020

Hon. Kenneth M. Karas  
United States District Court for the  
Southern District of New York  
300 Quarropas Street  
White Plains, New York

**Re:** *United States v. Robert Ciervo*  
**Case No.:** 19 Cr. 773 (KMK)

Dear Judge Karas,

I was assigned, pursuant to the Criminal Justice Act, to represent Robert Ciervo in the above matter. On October 8, 2019, Magistrate Judge Lisa Margaret Smith issued a bond for Mr. Ciervo, which ordered him released to an inpatient drug treatment program. He is currently at the Discovery Institute in Marlboro, NJ and we anticipate his time in the program will end soon. In preparation for his release, and at Pre-Trial's suggestion, a bail hearing has been scheduled before Judge Smith for this Thursday, March 5.

The Government has confirmed that the US Marshalls will not transport the client from the treatment program to Court this Thursday. Therefore, we ask for a modification of Mr. Ciervo's bail conditions to allow his mother Donnamarie Ciervo to drive Robert Ciervo out of the inpatient program and to Southern District Court so that he may attend the bail hearing this Thursday, March 5. As the Court was previously made aware, Mrs. Ciervo was originally authorized by Judge Smith to drive Mr. Ciervo from the Court to the inpatient drug treatment program, and understands that she is not to make any unnecessary stops as she is solely authorized to transport him to the District Court.

The Government has been notified of this request but has not provided their position yet. However, despite their concerns regarding the transport, they have previously had no objection.

Respectfully submitted,

s/ Sam Braverman

Samuel M. Braverman, Esq.

*LSantJ-*

*So Orderd*

*KMK*  
3/4/20

Cc. Cynthia Diaco, Pre-Trial - SDNY  
Kathleen Cullen, Pre-Trial – New Jersey  
Lindsey Keenan, AUSA  
Hon. Mag. Judge Lisa Margaret Smith

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